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Belmont, Massachusetts 02478-3057

Fax: (617) 484-0501

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June 8, 2001

Ms. Marlene Johansen
71 Pleasant Street
Stoneham, MA 02180

RE: Ralph Johansen v. Marlene Johansen

Dear Marlene:

Enclosed please find for your review and comment, the following documents received by mail today:

1. Appellee's Opposition to my Motion for Stay;
2. IRS Request for payment of \$32,866.16 date due June 4, 2001 for 1995;
3. IRS Request for payment of \$29,435.22 date due June 25, 2001 for 1996;
4. IRS Request for payment of \$36,820.51 date due June 11, 2001 for 1997;
5. IRS Request for payment of \$51,836.15 date due May 21, 2001 for 1998;
6. IRS Request for payment of \$19,286.58 date due May 21, 2001 for 1999;
7. IRS Request for payment of \$14,552.99 date due June 18, 2001 for 2000 and
8. Cover letter



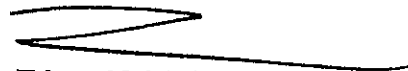
Marlene Johansen

June 8, 2001

Page 2

As we discussed again yesterday, I still am waiting for your marital history and court history narrative and supporting documents; the tax returns from 1980 to date; and the name, address and telephone number of your tax preparer. As you do not know how title to your home is held, and do not have your deed, I engaged a title examiner at the Registry to obtain this information which I then gave to the Appeals Court clerk to forward to the Appellate Judge who had requested same.

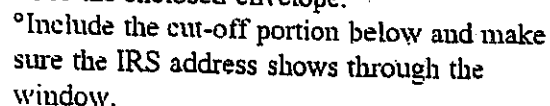
Very truly yours,



Edward M. Mahlowitz

EMM:mcr

Enclosures (as stated)



Tax Period: DEC. 31, 1995

- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,

- request that IRS remove the penalty, and

- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and
- a notice (if any) showing the penalty we charged that you now wish us to remove.

Interest: \$9,974.81

09 Interest

IRC section 6601

We charged interest because, according to our records, you didn't pay your tax on time. We figured interest from the due date of your return (regardless of extensions) to the date we received your full payments or the date of this notice.

Your interest computation is shown at the end of this notice.

* Additional Interest Charges

If the amount you owe is \$100,000 or more, please make sure that we receive your payment within 10 work days from the date of your notice. If the amount you owe is less than \$100,000, please make sure that we receive your payment within 21 calendar days from the date of your notice. If we don't receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the Internal Revenue Service (IRS) as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed - Erroneous Refund - IRC section 6602

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:

- you didn't cause the erroneous refund in any way, and
- the refund doesn't exceed \$50,000.

The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting - IRC section 6601

Effective January 1, 1987, through December 31, 1998, the interest rate we paid on the overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest that we pay and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero

General Rule - If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 99-43, 1999-47, I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available on the world wide web at www.irs.ustreas.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you filed your tax return, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund.

You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. mail:
Internal Revenue Service

Net Rate Interest Netting Claim
P.O. Box 9987
Mail Stop 6800
Ogden, UT 84409

Other than U.S. mail:

Internal Revenue Service
Net Rate Interest Netting Claim
1160 West 1200 South
Mail Stop 6800
Ogden, UT 84201

For interest you owed the IRS or that the IRS owed you on or after October 1, 1998, the IRS will take reasonable steps to identify these periods and apply the net interest rate of zero. However, to ensure that you receive the net interest rate of zero for overlapping periods, you should file a Form 843 following the procedures described above.

We compound interest daily except on late or underpaid estimated taxes for individuals or corporations.

We charge a special interest rate of 120% of the underpayment rate if:

- the return, not including extensions, was due before January 1, 1990,
- the underpayment was more than \$1,000, and
- the underpayment came from a tax-motivated transaction.

We charge interest on penalties for late filing, over or understating valuations, and substantially understating the tax you owe. Also, we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988.

We will continue to charge interest until you pay the amount you owe in full.

ANDOVER SERVICE CENTER

Tax Period: DEC. 31, 1995

The following table shows the penalty charges on your account. The calculation used for computing this filing and paying late penalty is principal x rate x number of months late.

Unpaid Tax:	Date	No. Months	Rate/Month	Principal	Penalty
	09/15/1996	05	4.50%	15106.00	3398.85
Total Penalty is:					3398.85


The following table shows the penalty charges on your account. The calculation used for computing this late paying penalty is principal x rate x number of months late.

Unpaid Tax on Return:	Date	No. Months	Rate/Month	Principal	Penalty
	05/15/2001	50	0.50%	15106.00	3776.50
Total Penalty is:					3776.50

The following table shows the interest charges on your account. The calculation used for computing this interest is principal x factor.

From Date	To Date	Days	Rate	Factor	Principal	Interest
04/15/1996	06/30/1996	76	8.0%	0.016748923	18504.85	309.94
06/30/1996	12/31/1996	184	9.0%	0.046279292	18814.79	870.74
12/31/1996	06/30/1997	181	9.0%	0.045635292	19685.53	898.35
06/30/1997	12/31/1997	184	9.0%	0.046408966	20583.88	955.28
12/31/1997	03/31/1998	90	9.0%	0.022437053	21539.16	483.28
03/31/1998	09/30/1998	183	8.0%	0.040920267	22022.44	901.16
09/30/1998	12/31/1998	92	8.0%	0.020366804	22923.60	466.88
12/31/1998	03/31/1999	90	7.0%	0.017408410	23390.48	407.19
03/31/1999	09/30/1999	183	8.0%	0.040920267	23797.67	973.81
09/30/1999	12/31/1999	92	8.0%	0.020366804	24771.48	504.52
12/31/1999	03/31/2000	91	8.0%	0.020087632	25276.00	507.73
03/31/2000	09/30/2000	183	9.0%	0.046022073	25783.73	1186.62
09/30/2000	12/31/2000	92	9.0%	0.022877946	26970.35	617.03
12/31/2000	03/31/2001	90	9.0%	0.022437053	27587.38	618.98
03/31/2001	05/14/2001	44	8.0%	0.009689420	28206.36	273.30
Total Interest:						9974.81

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls. Keep this part for your records.

 CUT HERE

Return this part to us with your check or inquiry.

Your Telephone Number: Best Time to Call:
() _____ AM _____ PM

44,928

34,862

7,876

Amount You Owe\$32,866.16

Less Payments Not Included \$ _____

Pay Adjusted Amount \$ _____



200118

01,09,02,07

08221-105-66040-1

14 Internal Revenue Service
ANDOVER, MA 05501

RALPHE JOHANSEN
PO BOX 24
BOSTON MA 02117-002427



Customer Service

Caller ID 934992

Number of this Notice: CP14

Date of this Notice: JUNE 4, 2001

Taxpayer Identification Number:

Tax Form 1040

Tax Period: DEC 31, 1996

Request for Payment

Amount you owe: \$29,435.22

Due Date: JUNE 25, 2001

1.1.1. General Information

RALPH E JOHANSEN
PO BOX 24
BOSTON MA 02117-0024247

According to our records, you have an amount due on your income tax. Please compare your tax return against the figures below. If you've already paid your tax in full or arranged for an installment agreement, please disregard this notice.

Your 1996 Tax Record	
Description	On Your Return
Total Tax On Return	\$14,442.00
Less:	
Tax Withheld	\$0.00
Estimated Payments	\$0.00
Other Credits	\$0.00
Other Payments	\$0.00
Total Payments & Credits	\$0.00
Underpaid Tax	\$14,442.00
Penalty	\$7,628.95
Interest	\$7,364.27
Total Amount You Owe	\$29,435.22

If we receive your payment by JUNE 25, 2001, we will not charge additional penalty and interest.

If you agree please:

"Make the check payable to "United States Treasury."

*Write your Taxpayer Identification Number on your check.

^aUse the enclosed envelope.

*Include the cut-off portion below and make sure the IRS address shows through the window.

If you disagree please:

^oCall the customer service number above.

***Have your Taxpayer Identification Number available.**

*If you wish to discuss a payment that you made by check, have the information from the front and back of your cancelled check available.



Department of the Treasury
Internal Revenue Service
ANDOVER, MA 05501

Customer Service

1-800-829-8815

Caller ID: 934992

If you call us refer to this information:

Number of this Notice: CP14

Date of this Notice: MAY 21, 2001

Taxpayer Identification Number:

Tax Form: 1040

Tax Period: DEC. 31, 1997

RALPH E JOHANSEN

PO BOX 24

BOSTON MA 02117-0024247

Request for Payment

Amount you owe: \$36,820.51

Due Date: JUNE 11, 2001

According to our records, you have an amount due on your income tax. Please compare your tax return against the figures below. If you've already paid your tax in full or arranged for an installment agreement, please disregard this notice.

Your 1997 Tax Record	
Description	On Your Return
Total Tax On Return	\$20,786.00
Less:	
Tax Withheld	\$0.00
Estimated Payments	\$0.00
Other Credits	\$0.00
Other Payments	\$0.00
Total Payments & Credits	\$0.00
Underpaid Tax	\$20,786.00
Penalty	\$8,626.19
Interest	\$7,408.32
Total Amount You Owe	\$36,820.51

If we receive your payment by JUNE 11, 2001, we will not charge additional penalty and interest.

If you agree please:

- °Make the check payable to "United States Treasury."
- °Write your Taxpayer Identification Number on your check.
- °Use the enclosed envelope.
- °Include the cut-off portion below and make sure the IRS address shows through the window.

If you disagree please:

- °Call the customer service number above.
- °Have your Taxpayer Identification Number available.
- °If you wish to discuss a payment that you made by check, have the information from the front and back of your cancelled check available.

Penalty and Interest

About Your Notice. The penalty and interest charges on your account are explained on the following pages. If you want a more detailed explanation of your penalties and interest, please call the telephone number listed on the top of this notice. You may call your local IRS telephone number if the number shown on your notice is a long-distance call for you. All days mentioned in the paragraphs below are calendar days, unless specifically stated otherwise.

Penalties: \$8,626.19

01 Filing and Paying Late \$4,676.85

IRC sections 6651 (a) (1) and 6651 (a) (2)

We charged a 5% combined penalty of 4 1/2% for filing late and 1/2% for paying late because, according to our records, you filed your return late and didn't pay your tax by the due date of your return. The combined penalty is 5% of your unpaid tax for each month or part of a month your return is late, but not for more than 5 months, which would total 25% (22 1/2% late filing and 2 1/2% late paying).

In addition to the 22 1/2% late filing penalty for the first 5 months your return is late, we continue to charge the 1/2% (1/4% for months covered by an installment agreement) late paying penalty for each month or part of a month for as long as your tax is unpaid, but not for more than 25%. The maximum penalty we can charge is 47 1/2% (22 1/2% late filing plus 25% late paying).

If you didn't file your income tax return within 60 days of the due date, the minimum penalty is \$100 or 100% of the balance of tax due on your tax return, whichever is smaller. If you think we should remove or reduce this penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

07 Paying Late \$3,949.34

IRC section 6651 (a) (2)

We charged a penalty because, according to our records, you didn't pay your tax on time. Initially, the penalty is 1/2% of the unpaid tax for each month or part of a month you didn't pay your tax.

Note: Effective for months beginning after December 31, 1999, the failure to pay tax penalty (FTP) for individuals who file a tax return on or before the due date (including extensions), is limited to half the usual rate (0.25 % rather than 0.5%) for any month in which an Installment Payment Agreement is in effect.

If we issue a Notice of Intent to Levy and you don't pay the balance due within 10 days from the date of the notice, the penalty increases to 1% a month. **Note:** We will not reduce the 1% FTP even if you filed timely and have a valid installment agreement.

The penalty can't be more than 25% of the tax paid late. If you think we should remove or reduce the penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

Removal of Penalties - Reasonable Cause

The law lets us remove or reduce the penalties we explain in this notice if you have an acceptable reason. If you believe you have an acceptable reason, you may send us a signed statement explaining your reason. We will review it and let you know if we accept your explanation as reasonable cause to remove or reduce your penalty. This procedure doesn't apply to interest and, in some cases, we may ask you to pay the tax in full before we reduce or remove the penalty for paying late.

Erroneous Written Advice from IRS

We will also remove your penalty if:

- you wrote to IRS and asked for advice on a specific issue,
- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,
- request that IRS remove the penalty, and
- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and
- a notice (if any) showing the penalty we charged that you now wish us to remove.

ANDOVER SERVICE CENTER

Tax Period: DEC. 31, 1997

Interest: \$7,408.32

09 Interest

IRC section 6601

We charged interest because, according to our records, you didn't pay your tax on time. We figured interest from the due date of your return (regardless of extensions) to the date we received your full payments or the date of this notice.

Your interest computation is shown at the end of this notice.

* Additional Interest Charges

If the amount you owe is \$100,000 or more, please make sure that we receive your payment within 10 work days from the date of your notice. If the amount you owe is less than \$100,000, please make sure that we receive your payment within 21 calendar days from the date of your notice. If we don't receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the Internal Revenue Service (IRS) as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed - Erroneous Refund - IRC section 6602

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:

- you didn't cause the erroneous refund in any way, and
- the refund doesn't exceed \$50,000.

The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting - IRC section 6601

Effective January 1, 1987, through December 31, 1998, the interest rate we paid on the overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest that we pay and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero

General Rule - If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 99-43, 1999-47, I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available on the world wide web at www.irs.ustreas.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you filed your tax return, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund.

You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. mail:

Internal Revenue Service
Net Rate Interest Netting Claim
P.O. Box 9987
Mail Stop 6800
Ogden, UT 84409

Other than U.S. mail:

Internal Revenue Service
Net Rate Interest Netting Claim
1160 West 1200 South
Mail Stop 6800
Ogden, UT 84201

For interest you owed the IRS or that the IRS owed you on or after October 1, 1998, the IRS will take reasonable steps to identify these periods and apply the net interest rate of zero. However, to ensure that you receive the net interest rate of zero for overlapping periods, you should file a Form 843 following the procedures described above.

We compound interest daily except on late or underpaid estimated taxes for individuals or corporations.

We charge a special interest rate of 120% of the underpayment rate if:

- the return, not including extensions, was due before January 1, 1990,
- the underpayment was more than \$1,000. and

- the underpayment came from a tax-motivated transaction.

We charge interest on penalties for late filing, over or understating valuations, and substantially understating the tax you owe. Also,

we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988.

We will continue to charge interest until you pay the amount you owe in full.

ANDOVER SERVICE CENTER

337

Tax Period: DEC. 31, 1997

The following table shows the penalty charges on your account. The calculation used for computing this filing and paying late penalty is principal x rate x number of months late.

Unpaid Tax:	Date	No. Months	Rate/Month	Principal	Penalty
	09/15/1998	05	4.50%	20786.00	4676.85
Total Penalty is:					4676.85

The following table shows the penalty charges on your account. The calculation used for computing this late paying penalty is principal x rate x number of months late.


Unpaid Tax on Return:	Date	No. Months	Rate/Month	Principal	Penalty
	06/15/2001	38	0.50%	20786.00	3949.34
Total Penalty is:					3949.34

The following table shows the interest charges on your account. The calculation used for computing this interest is principal x factor.

From Date	To Date	Days	Rate	Factor	Principal	Interest
04/15/1998	09/30/1998	168	8.0%	0.037504057	25462.85	954.96
09/30/1998	12/31/1998	92	8.0%	0.020366804	26417.81	538.05
12/31/1998	03/31/1999	90	7.0%	0.017408410	26955.86	469.26
03/31/1999	09/30/1999	183	8.0%	0.040920267	27425.12	1122.24
09/30/1999	12/31/1999	92	8.0%	0.020366804	28547.36	581.42
12/31/1999	03/31/2000	91	8.0%	0.020087632	29128.78	585.13
03/31/2000	09/30/2000	183	9.0%	0.046022073	29713.91	1367.50
09/30/2000	12/31/2000	92	9.0%	0.022877946	31081.41	711.08
12/31/2000	03/31/2001	90	9.0%	0.022437053	31792.49	713.33
03/31/2001	05/21/2001	51	8.0%	0.011239552	32505.82	365.35
Total Interest:						7408.32

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls.

Keep this part for your records

 CUT HERE

Return this part to us with your check or inquiry.

Your Telephone Number: () _____ Best Time to Call: _____ AM _____ PM
 60,577 49,181 9,695

Amount You Owe\$36,820.51

Less Payments Not Included \$ _____

Pay Adjusted Amount \$ _____



200119

01,09,07

08221-105-66147-1

14 Internal Revenue Service
 ANDOVER, MA 05501

RALPH E JOHANSEN
 PO BOX 24
 BOSTON MA 02117-002427





Department of the Treasury
Internal Revenue Service
ANDOVER, MA 05501

Customer Service

1-800-829-8815

Caller ID: 934992

If you call us refer to this information:

Number of this Notice: CP14

Date of this Notice: APR. 30, 2001

Taxpayer Identification Number:

Tax Form: 1040

Tax Period: DEC. 31, 1998



RALPH E JOHANSEN

PO BOX 24

BOSTON MA 02117-0024247

Request for Payment

Amount you owe: \$51,836.15

Due Date: MAY 21, 2001

According to our records, you have an amount due on your income tax. Please compare your tax return against the figures below. If you've already paid your tax in full or arranged for an installment agreement, please disregard this notice.

Your 1998 Tax Record	
Description	On Your Return
Total Tax On Return	\$32,772.00
Less:	
Tax Withheld	\$.00
Estimated Payments	\$.00
Other Credits	\$.00
Other Payments	\$.00
Total Payments & Credits	\$.00
Underpaid Tax	\$32,772.00
Penalty	\$11,470.20
Interest	\$7,593.95
Total Amount You Owe	\$51,836.15

If we receive your payment by MAY 21, 2001, we will not charge additional penalty and interest.

If you agree please:

- °Make the check payable to "United States Treasury."
- °Write your Taxpayer Identification Number on your check.
- °Use the enclosed envelope.
- °Include the cut-off portion below and make sure the IRS address shows through the window.

If you disagree please:

- °Call the customer service number above.
- °Have your Taxpayer Identification Number available.
- °If you wish to discuss a payment that you made by check, have the information from the front and back of your cancelled check available.

Penalty and Interest

About Your Notice. The penalty and interest charges on your account are explained on the following pages. If you want a more detailed explanation of your penalties and interest, please call the telephone number listed on the top of this notice. You may call your local IRS telephone number if the number shown on your notice is a long-distance call for you. All days mentioned in the paragraphs below are calendar days, unless specifically stated otherwise.

Penalties: \$11,470.20

01 Filing and Paying Late \$7,373.70

IRC sections 6651 (a) (1) and 6651 (a) (2)

We charged a 5% combined penalty of 4 1/2% for filing late and 1/2% for paying late because, according to our records, you filed your return late and didn't pay your tax by the due date of your return. The combined penalty is 5% of your unpaid tax for each month or part of a month your return is late, but not for more than 5 months, which would total 25% (22 1/2% late filing and 2 1/2% late paying).

In addition to the 22 1/2% late filing penalty for the first 5 months your return is late, we continue to charge the 1/2% (1/4% for months covered by an installment agreement) late paying penalty for each month or part of a month for as long as your tax is unpaid, but not for more than 25%. The maximum penalty we can charge is 47 1/2% (22 1/2% late filing plus 25% late paying).

If you didn't file your income tax return within 60 days of the due date, the minimum penalty is \$100 or 100% of the balance of tax due on your tax return, whichever is smaller. If you think we should remove or reduce this penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

07 Paying Late \$4,096.50

IRC section 6651 (a) (2)

We charged a penalty because, according to our records, you didn't pay your tax on time. Initially, the penalty is 1/2% of the unpaid tax for each month or part of a month you didn't pay your tax.

Note: Effective for months beginning after December 31, 1999, the failure to pay tax penalty (FTP) for individuals who file a tax return on or before the due date (including extensions), is limited to half the usual rate (0.25 % rather than 0.5%) for any month in which an Installment Payment Agreement is in effect.

If we issue a Notice of Intent to Levy and you don't pay the balance due within 10 days from the date of the notice, the penalty increases to 1% a month. **Note:** We will not reduce the 1% FTP even if you filed timely and have a valid installment agreement.

The penalty can't be more than 25% of the tax paid late. If you think we should remove or reduce the penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

Removal of Penalties - Reasonable Cause

The law lets us remove or reduce the penalties we explain in this notice if you have an acceptable reason. If you believe you have an acceptable reason, you may send us a signed statement explaining your reason. We will review it and let you know if we accept your explanation as reasonable cause to remove or reduce your penalty. This procedure doesn't apply to interest and, in some cases, we may ask you to pay the tax in full before we reduce or remove the penalty for paying late.

Erroneous Written Advice from IRS

We will also remove your penalty if:

- you wrote to IRS and asked for advice on a specific issue,
- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,
- request that IRS remove the penalty, and
- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and
- a notice (if any) showing the penalty we charged that you now wish us to remove.

ANDOVER SERVICE CENTER

Tax Period: DEC. 31, 1998

Interest: \$7,593.95**09 Interest****IRC section 6601**

We charged interest because, according to our records, you didn't pay your tax on time. We figured interest from the due date of your return (regardless of extensions) to the date we received your full payments or the date of this notice.

Your interest computation is shown at the end of this notice.

*** Additional Interest Charges**

If the amount you owe is \$100,000 or more, please make sure that we receive your payment within 10 work days from the date of your notice. If the amount you owe is less than \$100,000, please make sure that we receive your payment within 21 calendar days from the date of your notice. If we don't receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the Internal Revenue Service (IRS) as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed - Erroneous Refund - IRC section 6602

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:

- you didn't cause the erroneous refund in any way, and
- the refund doesn't exceed \$50,000.

The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting - IRC section 6601

Effective January 1, 1987, through December 31, 1998, the interest rate we paid on the overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest that we pay and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero

General Rule - If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 99-43, 1999-47, I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available on the world wide web at www.irs.ustreas.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you filed your tax return, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund.

You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. mail:
Internal Revenue Service
Net Rate Interest Netting Claim
P.O. Box 9987
Mail Stop 6800
Ogden, UT 84409

Other than U.S. mail:
Internal Revenue Service
Net Rate Interest Netting Claim
1160 West 1200 South
Mail Stop 6800
Ogden, UT 84201

For interest you owed the IRS or that the IRS owed you on or after October 1, 1998, the IRS will take reasonable steps to identify these periods and apply the net interest rate of zero. However, to ensure that you receive the net interest rate of zero for overlapping periods, you should file a Form 843 following the procedures described above.

We compound interest daily except on late or underpaid estimated taxes for individuals or corporations.

We charge a special interest rate of 120% of the underpayment rate if:

- the return, not including extensions, was due before January 1, 1990,
- the underpayment was more than \$1,000, and

- the underpayment came from a tax-motivated transaction.

We charge interest on penalties for late filing, over or understating valuations, and substantially understating the tax you owe. Also,

we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988.

We will continue to charge interest until you pay the amount you owe in full.

The following table shows the penalty charges on your account. The calculation used for computing this filing and paying late penalty is principal x rate x number of months late.

Unpaid Tax:	Date	No. Months	Rate/Month	Principal	Penalty
	09/15/1999	05	4.50%	32772.00	7373.70
Total Penalty is:					7373.70

The following table shows the penalty charges on your account. The calculation used for computing this late paying penalty is principal x rate x number of months late.

Unpaid Tax on Return:	Date	No. Months	Rate/Month	Principal	Penalty
	05/15/2001	25	0.50%	32772.00	4096.50
Total Penalty is:					4096.50

The following table shows the interest charges on your account. The calculation used for computing this interest is principal x factor.

From Date	To Date	Days	Rate	Factor	Principal	Interest
04/15/1999	09/30/1999	168	8.0%	0.037504057	40145.70	1505.63
09/30/1999	12/31/1999	92	8.0%	0.020366804	41651.33	848.30
12/31/1999	03/31/2000	91	8.0%	0.020087632	42499.63	853.72
03/31/2000	09/30/2000	183	9.0%	0.046022073	43353.35	1995.21
09/30/2000	12/31/2000	92	9.0%	0.022877946	45348.56	1037.48
12/31/2000	03/31/2001	90	9.0%	0.022437053	46386.04	1040.77
03/31/2001	04/30/2001	30	8.0%	0.006596282	47426.81	312.84
Total Interest:						7593.95

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls. Keep this part for your records.

CUT HERE

Return this part to us with your check or inquiry.

Your Telephone Number: () _____
87,673

Best Time to Call: _____ AM _____ PM
80,035 9,881

Amount You Owe\$51,836.15

Less Payments Not Included \$ _____

Pay Adjusted Amount \$ _____



200116

01,09,07

08221-097-89530-1

14 Internal Revenue Service
ANDOVER, MA 05501



RALPH E JOHANSEN
PO BOX 24
BOSTON MA 02117-0024247



Department of the Treasury
Internal Revenue Service
ANDOVER, MA 05501

Customer Service

1-800-829-8815

Caller ID: 934992

If you call us refer to this information:

Number of this Notice: CP14

Date of this Notice: APR. 30, 2001

Taxpayer Identification Number:

Tax Form: 1040

Tax Period: DEC. 31, 1999

RALPH E JOHANSEN

PO BOX 24

BOSTON MA 02117-0024247

Request for Payment

Amount you owe: \$19,286.58

Due Date: MAY 21, 2001

According to our records, you have an amount due on your income tax. Please compare your tax return against the figures below. If you've already paid your tax in full or arranged for an installment agreement, please disregard this notice.

Your 1999 Tax Record	
Description	On Your Return
Total Tax On Return	\$13,237.00
Less:	
Tax Withheld	\$0.00
Estimated Payments	\$0.00
Other Credits	\$0.00
Other Payments	\$0.00
Total Payments & Credits	\$0.00
Underpaid Tax	\$13,237.00
Penalty	\$4,474.72
Interest	\$1,574.86
Total Amount You Owe	\$19,286.58

If we receive your payment by MAY 21, 2001, we will not charge additional penalty and interest.

If you agree please:

- °Make the check payable to "United States Treasury."
- °Write your Taxpayer Identification Number on your check.
- °Use the enclosed envelope.
- °Include the cut-off portion below and make sure the IRS address shows through the window.

If you disagree please:

- °Call the customer service number above.
- °Have your Taxpayer Identification Number available.
- °If you wish to discuss a payment that you made by check, have the information from the front and back of your cancelled check available.

Penalty and Interest

About Your Notice. The penalty and interest charges on your account are explained on the following pages. If you want a more detailed explanation of your penalties and interest, please call the telephone number listed on the top of this notice. You may call your local IRS telephone number if the number shown on your notice is a long-distance call for you. All days mentioned in the paragraphs below are calendar days, unless specifically stated otherwise.

Penalties: \$4,474.72

01 Filing and Paying Late \$2,978.32

IRC sections 6651 (a) (1) and 6651 (a) (2)

We charged a 5% combined penalty of 4 1/2% for filing late and 1/2% for paying late because, according to our records, you filed your return late and didn't pay your tax by the due date of your return. The combined penalty is 5% of your unpaid tax for each month or part of a month your return is late, but not for more than 5 months, which would total 25% (22 1/2% late filing and 2 1/2% late paying).

In addition to the 22 1/2% late filing penalty for the first 5 months your return is late, we continue to charge the 1/2% (1/4% for months covered by an installment agreement) late paying penalty for each month or part of a month for as long as your tax is unpaid, but not for more than 25%. The maximum penalty we can charge is 47 1/2% (22 1/2% late filing plus 25% late paying).

If you didn't file your income tax return within 60 days of the due date, the minimum penalty is \$100 or 100% of the balance of tax due on your tax return, whichever is smaller. If you think we should remove or reduce this penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

02 Underpayment or Late Payment of Estimated Tax \$636.00

IRC section 6654

We charged you a penalty because, according to our records, you didn't estimate your tax and pay the correct amount of tax due.

Individuals, Estates and Certain Trusts - If you expect to owe tax of \$1,000 or more for the tax year, you must prepay the tax by having tax withheld or by making estimated tax payments. We charge a penalty when the total tax you pay during the year doesn't meet the requirements of the law.

You are required to pay at least 90% of the tax shown on your return for the current year or 100% of the tax shown on your return for the prior year, whichever is less. The required installment each quarter is generally 25% of the required annual payment.

Estimated Tax Safe Harbor for Higher Income Individuals -

For tax years after 1993, if your adjusted gross income in the preceding year is more than \$150,000 (\$75,000 if your filing status is married filing separately), the required payments are as follows:

For 1999: Your required payment is the lesser of 90% of the tax shown on your current year return or 105% of the tax shown on your prior year return.

For more information on when the estimated tax penalty may be reduced or removed, see the instructions for Form 2210 for your tax year or Publication 505, Tax Withholding and Estimated Tax.

07 Paying Late \$860.40

IRC section 6651 (a) (2)

We charged a penalty because, according to our records, you didn't pay your tax on time. Initially, the penalty is 1/2% of the unpaid tax for each month or part of a month you didn't pay your tax.

Note: Effective for months beginning after December 31, 1999, the failure to pay tax penalty (FTP) for individuals who file a tax return on or before the due date (including extensions), is limited to half the usual rate (0.25 % rather than 0.5%) for any month in which an Installment Payment Agreement is in effect.

If we issue a Notice of Intent to Levy and you don't pay the balance due within 10 days from the date of the notice, the penalty increases to 1% a month. **Note:** We will not reduce the 1% FTP even if you filed timely and have a valid installment agreement.

The penalty can't be more than 25% of the tax paid late. If you think we should remove or reduce the penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

Removal of Penalties - Reasonable Cause

The law lets us remove or reduce the penalties we explain in this notice if you have an acceptable reason. If you believe you have an acceptable reason, you may send us a signed statement explaining your reason. We will review it and let you know if we accept your explanation as reasonable cause to remove or reduce your penalty. This procedure doesn't apply to interest and, in some cases, we may ask you to pay the tax in full before we reduce or remove the penalty for paying late.

Erroneous Written Advice from IRS

We will also remove your penalty if:

-you wrote to IRS and asked for advice on a specific issue,

- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,

- request that IRS remove the penalty, and
- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and
- a notice (if any) showing the penalty we charged that you now wish us to remove.

Interest: \$1,574.86

09 Interest

IRC section 6601

We charged interest because, according to our records, you didn't pay your tax on time. We figured interest from the due date of your return (regardless of extensions) to the date we received your full payments or the date of this notice.

Your interest computation is shown at the end of this notice.

* Additional Interest Charges

- If the amount you owe is \$100,000 or more, please make sure that we receive your payment within 10 work days from the date of your notice. If the amount you owe is less than \$100,000, please make sure that we receive your payment within 21 calendar days from the date of your notice. If we don't receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the Internal Revenue Service (IRS) as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed - Erroneous Refund - IRC section 6602

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:

- you didn't cause the erroneous refund in any way, and
- the refund doesn't exceed \$50,000.

The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting - IRC section 6601

Effective January 1, 1987, through December 31, 1998, the interest rate we paid on the overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest that we pay and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero

General Rule - If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 99-43, 1999-47, I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available on the world wide web at www.irs.ustreas.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you filed your tax return, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund.

You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. mail:
Internal Revenue Service

Net Rate Interest Netting Claim
P.O. Box 9987
Mail Stop 6800
Ogden, UT 84409

Other than U.S. mail:

Internal Revenue Service
Net Rate Interest Netting Claim
1160 West 1200 South
Mail Stop 6800
Ogden, UT 84201

For interest you owed the IRS or that the IRS owed you on or after October 1, 1998, the IRS will take reasonable steps to identify these periods and apply the net interest rate of zero. However, to ensure that you receive the net interest rate of zero for overlapping periods, you should file a Form 843 following the procedures described above.

We compound interest daily except on late or underpaid estimated taxes for individuals or corporations.

We charge a special interest rate of 120% of the underpayment rate if:

- the return, not including extensions, was due before January 1, 1990,
- the underpayment was more than \$1,000, and
- the underpayment came from a tax-motivated transaction.

We charge interest on penalties for late filing, over or understating valuations, and substantially understating the tax you owe. Also, we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988.

We will continue to charge interest until you pay the amount you owe in full.

The following table shows the penalty charges on your account. The calculation used for computing this filing and paying late penalty is principal x rate x number of months late.

Unpaid Tax:	Date	No. Months	Rate/Month	Principal	Penalty
	09/15/2000	05	4.50%	13237.00	2978.32
Total Penalty is:					2978.32

The following table shows the penalty charges on your account. The calculation used for computing this late paying penalty is principal x rate x number of months late.

Unpaid Tax on Return:	Date	No. Months	Rate/Month	Principal	Penalty
	05/15/2001	13	0.50%	13237.00	860.40
Total Penalty is:					860.40

The following table shows the interest charges on your account. The calculation used for computing this interest is principal x factor.

From Date	To Date	Days	Rate	Factor	Principal	Interest
04/15/2000	09/30/2000	168	9.0%	0.042171375	16215.32	683.82
09/30/2000	12/31/2000	92	9.0%	0.022877946	16899.14	386.62
12/31/2000	03/31/2001	90	9.0%	0.022437053	17285.76	387.84
03/31/2001	04/30/2001	30	8.0%	0.006596282	17673.60	116.58
Total Interest:						1574.86

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls. Keep this part for your records

CUT HERE

Return this part to us with your check or inquiry.

Your Telephone Number: 32,231
 Best Time to Call: 22,293 AM 9,769 PM

Amount You Owe\$19,286.58

Less Payments Not Included \$

Pay Adjusted Amount \$



200116 01,09,02,07 08221-097-89434-1

14 Internal Revenue Service
 ANDOVER, MA 05501

RALPH E JOHANSEN
 PO BOX 24
 BOSTON MA 02117-002427



Penalty and Interest

About Your Notice. The penalty and interest charges on your account are explained on the following pages. If you want a more detailed explanation of your penalties and interest, please call the telephone number listed on the top of this notice. You may call your local IRS telephone number if the number shown on your notice is a long-distance call for you. All days mentioned in the paragraphs below are calendar days, unless specifically stated otherwise.

Penalties: \$864.60

02 Underpayment or Late Payment of Estimated Tax \$729.00

IRC section 6654

We charged you a penalty because, according to our records, you didn't estimate your tax and pay the correct amount of tax due.

Individuals, Estates and Certain Trusts - If you expect to owe tax of \$1,000 or more for the tax year, you must prepay the tax by having tax withheld or by making estimated tax payments. We charge a penalty when the total tax you pay during the year doesn't meet the requirements of the law.

You are required to pay at least 90% of the tax shown on your return for the current year or 100% of the tax shown on your return for the prior year, whichever is less. The required installment each quarter is generally 25% of the required annual payment.

Estimated Tax Safe Harbor for Higher Income Individuals -
For tax years after 1993, if your adjusted gross income in the preceding year is more than \$150,000 (\$75,000 if your filing status is married filing separately), the required payments are as follows:

For 2000: Your required payment is the lesser of 90% of the tax shown on your current year return or 108.6% of the tax shown on your prior year return.

For more information on when the estimated tax penalty may be reduced or removed, see the instructions for Form 2210 for your tax year or Publication 505, Tax Withholding and Estimated Tax.

07 Paying Late \$135.60

IRC section 6651 (a) (2)

We charged a penalty because, according to our records, you didn't pay your tax on time. Initially, the penalty is 1/2% of the unpaid tax for each month or part of a month you didn't pay your tax.

Note: Effective for months beginning after December 31, 1999, the failure to pay tax penalty (FTP) for individuals who file a tax return on or before the due date (including extensions), is limited to half the usual rate (0.25 % rather than 0.5%) for any month in which an Installment Payment Agreement is in effect.

If we issue a Notice of Intent to Levy and you don't pay the balance due within 10 days from the date of the notice, the penalty increases to 1% a month. Note: We will not reduce the 1% FTP even if you filed timely and have a valid installment agreement.

The penalty can't be more than 25% of the tax paid late. If you think we should remove or reduce the penalty, see "Removal of Penalties - Reasonable Cause."

Your penalty computation is shown at the end of this notice.

Removal of Penalties - Reasonable Cause

The law lets us remove or reduce the penalties we explain in this notice if you have an acceptable reason. If you believe you have an acceptable reason, you may send us a signed statement explaining your reason. We will review it and let you know if we accept your explanation as reasonable cause to remove or reduce your penalty. This procedure doesn't apply to interest and, in some cases, we may ask you to pay the tax in full before we reduce or remove the penalty for paying late.

Erroneous Written Advice from IRS

We will also remove your penalty if:

- you wrote to IRS and asked for advice on a specific issue,
- you gave IRS complete and accurate information,
- IRS wrote back to you and gave you a specific course of action to take or explained what actions not to take,
- you followed our written advice in the manner we outlined, and
- you were penalized for the written advice we gave you.

To have the penalty removed because of erroneous written advice from IRS you should:

- complete Form 843, Claim for Refund and Request for Abatement,
- request that IRS remove the penalty, and
- send Form 843 to the IRS Service Center where you filed your return for the year you relied on erroneous advice from the IRS.

The three documents you must attach to your Form 843 are:

- a copy of your original request for advice from IRS,
- a copy of the erroneous written advice from IRS, and

-a notice (if any) showing the penalty we charged that you now wish us to remove.

Interest: \$128.39

09 Interest

IRC section 6601

We charged interest because, according to our records, you didn't pay your tax on time. We figured interest from the due date of your return (regardless of extensions) to the date we received your full payments or the date of this notice.

Your interest computation is shown at the end of this notice.

*** Additional Interest Charges**

If the amount you owe is \$100,000 or more, please make sure that we receive your payment within 10 work days from the date of your notice. If the amount you owe is less than \$100,000, please make sure that we receive your payment within 21 calendar days from the date of your notice. If we don't receive full payment within these time frames, the law requires us to charge interest until you pay the full amount you owe.

Interest Paid

Beginning with tax year 1991, you can no longer deduct interest you paid to the Internal Revenue Service (IRS) as an itemized deduction on your Form 1040, Schedule A.

Interest Reduced

If we reduce interest that you previously reported as a deduction on your tax return, you must report this reduction of interest as income on your tax return for the year we reduce it.

Interest Removed - Erroneous Refund - IRC section 6602

The law requires us to remove interest up to the date we request you to repay the erroneous refund when:

- you didn't cause the erroneous refund in any way, and
- the refund doesn't exceed \$50,000.

The IRS may remove or reduce interest on other erroneous refunds based on the facts and circumstances involved in each case.

Annual Interest Netting - IRC section 6601

Effective January 1, 1987, through December 31, 1998, the interest rate we paid on the overpayment of taxes was 1% less than the interest rate we charged on the underpayment of taxes. As of January 1, 1999, the overpayment and underpayment rates of interest that we pay and charge are the same, except for corporate overpayments. If we refund an overpayment with interest and we have to increase the tax at a later date, we give special consideration to the interest on that account.

On the tax increase made after the refund, we will charge the lower refund rate of interest (up to the amount of the refund) for the same time period that we paid interest on the overpayment.

Request for Net Interest Rate of Zero

General Rule - If you owe interest to the IRS on an underpayment for the same period of time that the IRS owes you interest on an overpayment, you may be entitled to receive a net interest rate of zero (the same rate of interest applies to your underpayment as your overpayment).

To receive the net interest rate of zero for interest you owed (or paid) the IRS, or interest that we owed (or paid) you before October 1, 1998, you must file a Form 843, Claim for Refund and Request for Abatement. For more information on the filing requirements for the Form 843, see Revenue Procedure 99-43, 1999-47, I.R.B. 579. Revenue Procedure 99-43 and Form 843 are available on the world wide web at www.irs.ustreas.gov.

To qualify for the net interest rate of zero, the period of limitation for claiming a refund of interest on an underpayment and the period of limitation for claiming additional interest on an overpayment must have been open on July 22, 1998. Generally, the period of limitation for claiming a refund of interest on an underpayment is 3 years from the time you filed your tax return, or 2 years from the time you paid the interest, whichever is later. The period of limitation to request additional interest on an overpayment is 6 years from the date of the refund.

You must file Form 843 on or before the closing date of the later statute of limitation period. Mail Form 843 to:

U.S. mail:
Internal Revenue Service
Net Rate Interest Netting Claim
P.O. Box 9987
Mail Stop 6800
Ogden, UT 84409

Other than U.S. mail:
Internal Revenue Service
Net Rate Interest Netting Claim
1160 West 1200 South
Mail Stop 6800
Ogden, UT 84201

For interest you owed the IRS or that the IRS owed you on or after October 1, 1998, the IRS will take reasonable steps to identify these periods and apply the net interest rate of zero. However, to ensure that you receive the net interest rate of zero for overlapping periods, you should file a Form 843 following the procedures described above.

We compound interest daily except on late or underpaid estimated taxes for individuals or corporations.

We charge a special interest rate of 120% of the underpayment rate if:

- the return, not including extensions, was due before January 1, 1990;
- the underpayment was more than \$1,000, and
- the underpayment came from a tax-motivated transaction.

We charge interest on penalties for late filing, over or understating valuations, and substantially understating the tax you owe. Also, we charge interest on fraud and negligence penalties if the tax returns, including extensions, are due after December 31, 1988.

We will continue to charge interest until you pay the amount you owe in full.

The following table shows the penalty charges on your account. The calculation used for computing this late paying penalty is principal x rate x number of months late.

Unpaid Tax on Return:	Date	No. Months	Rate/Month	Principal	Penalty
	06/15/2001	02	0.50%	13560.00	135.60
Total Penalty is:					135.60

The following table shows the interest charges on your account. The calculation used for computing this interest is principal x factor.

From Date	To Date	Days	Rate	Factor	Principal	Interest
04/15/2001	05/28/2001	43	8.0%	0.009468167	13560.00	128.39
Total Interest:						128.39

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls. Keep this part for your records

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Return this part to us with your check or inquiry.

Your Telephone Number: () 32,619 22,651 10,090
 Best Time to Call: AM PM

Amount You Owe\$14,552.99

Less Payments Not Included \$

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14 Internal Revenue Service
 ANDOVER, MA 05501

RALPH JOHANSEN

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BOSTON MA 02117-0024247

